

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
WILLIAM DALLAS TROTT JR.	:	CASE NO. 1-17-02764-HWV
aka William D. Trott Jr.	:	
aka William D. Trott	:	CHAPTER 13
VONDA KAY TROTT	:	
aka Vonda K. Trott	:	
Debtors	:	
	:	
SPECIALIZED LOAN SERVICING LLC:	:	
Servicer for The Bank of New York	:	
Mellon FKA The Bank of New York, as	:	
Trustee for the certificate holders of the	:	
CWABS, Inc., Asset-Backed Certificates,	:	
Series 2007-9	:	
Movant	:	
	:	
v.	:	
	:	
WILLIAM DALLAS TROTT JR.	:	
aka William D. Trott Jr.	:	
aka William D. Trott	:	
VONDA KAY TROTT	:	
aka Vonda K. Trott	:	
Respondents	:	

**DEBTORS' RESPONSE TO MOTION OF SPECIALIZED LOAN
SERVICING LLC SERVICER FOR THE BANK OF NEW YORK MELLON
FKA THE BANK OF NEW YORK, AS TRUSTEE FOR THE CERTIFICATE
HOLDERS OF THE CWABS, INC., ASSET-BACKED CERTIFICATES,
SERIES 2007-9 FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come Debtors, William Dallas Trott Jr. and Vonda Kay Trott, by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

1. Admitted in part and denied in part. Debtors have no knowledge as to the servicer.

Strict proof is demanded.

2. Admitted.

3. Admitted.

4. Admitted in part and denied in part. Debtors have no knowledge as to who is the holder of the mortgage.

5. Admitted.

6. Admitted in part and denied in part. Debtors' counsel has provided proof that checks number 1144 and 1145 were cashed on December 29, 2021 by the Movant. Further, Debtors sent a check on December 29, 2021 to the Movant that was recently cashed. Finally, Debtors sent a payment on January 7, 2022 which has not been cashed. These payments bring the Debtors current on their post-petition obligations through January 2022.

7. Admitted in part and denied in part. See response to paragraph 6.

8. Denied. Movant is not entitled to relief. The property is necessary for an effective reorganization since it is the Debtors' home. Debtors are providing adequate protection through regular monthly payments. To the extent that the monthly payments are in arrears, Debtors will make an offer to cure same in the near future.

9. Admitted in part and denied in part. Movant is not entitled to fees and costs since the amount of Movant's claim exceeds the fair market value of the property. 11 U.S.C. § 506(b), United Savings Association v. Timbers of Inwood Forest Assocs., Ltd., 484 U.S. 365 (U.S. Supreme Court 1988). The amount owed to Movant according to Amended Claim No. 2 is \$445,627.41. The value of the property at the time of the filing of the bankruptcy was \$287,342.00 in accordance with the market analysis attached to the Schedules. Accordingly, there is no equity in the property over and above what is owed on the mortgage. As a result, Movant cannot collect attorney's fees and costs for this proceeding.

WHEREFORE, Debtors respectfully request that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



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DATED: 1/13/22

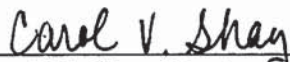
CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF SPECIALIZED LOAN SERVICING LLC SERVICER FOR THE BANK OF NEW YORK MELLON FKA THE BANK OF NEW YORK, AS TRUSTEE FOR THE CERTIFICATE HOLDERS OF THE CWABS, INC., ASSET-BACKED CERTIFICATES, SERIES 2007-9 FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

DENISE CARLON, ESQUIRE
KML LAW GROUP, P.C.
COUNSEL FOR MOVANT
VIA E-SERVICE

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DATED: 1/13/2022